

EXHIBIT B (contd.)

Copy of All Filings with State Court

D-1-GN-18-001835

NEIL HESLIN and
SCARLETT LEWIS

VS.

ALEX E. JONES, INFOWARS, LLC,
FREE SPEECH SYSTEMS, LLC,
and OWEN SHROYER

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IN DISTRICT COURT OF
TRAVIS COUNTY, TEXAS
261st DISTRICT COURT

PLAINTIFFS' THIRD SUPPLEMENTAL DESIGNATION OF EXPERTS

COMES NOW, Neil Heslin and Scarlett Lewis, Plaintiffs, and files this Third Supplemental Designation of Expert Witnesses, and in supplementation of all prior discovery requests requesting identification of expert witnesses, as follows:

I.

Plaintiff's Non-Retained Medical Experts

W. Michael Crouch, LCSW
And Custodians of Medical and Billing Records
999 Summer Street, Ste. 200
Stamford, CT 06905
(203) 961-1152

All medical care providers listed above may testify regarding matters contained in their records and depositions. Their observations, diagnosis, opinions, prognosis, facts, physical and clinical examinations, and tests done, reviewed or relied upon are incorporated herein by reference. This includes opinions regarding Plaintiff's pain, mental anguish, medical care, medical expenses, limitations, physical impairment, or any other medical issue in this case. The Custodians of Records will authenticate the records.

Plaintiff is unaware of the general substance of these experts' mental impressions and opinions, as they are treating physicians and custodians of records. However, presumably the general substance of these experts' impressions and opinions would be as contained in their respective records.

Plaintiff's Retained Experts

Fred Zipp
University of Texas School of Journalism
300 W Dean Keeton St
Austin, TX 78712
(512) 471-1845

Mr. Zipp is a former newspaper editor and journalism professor. He will offer his expertise concerning the standards of care in news reporting, and he will opine on how those standards were recklessly disregarded in this case. Mr. Zipp will opine that Defendants ignored elementary precautions in journalism. Mr. Zipp will also opine that Defendants entertained serious doubts about the accuracy of their statements. Mr. Zipp will analyze the facts and circumstances of the publications which show that Defendants were motivated by a desire to avoid the truth and to inflict harm on Plaintiff. Materials reviewed by Mr. Zipp are being produced as SANDY HOOK-000001-000642. Mr. Zipp has also reviewed the March 4, 2019 deposition of Alex Jones, the November 26, 2019 deposition of Alex Jones, the November 26, 2019 deposition of Free Speech Systems, and the November 27, 2019 deposition of Paul Watson. Mr. Zipp has also reviewed the YouTube video clips described in his affidavits submitted in response to Defendants' TCPA Motions. Mr. Zipp has also reviewed the videos produced as SH VIDEO 13, consisting of Megyn Kelly's profile of Alex Jones, and SH VIDEO 14, consisting of Anderson Cooper's Interview with Veronique De La Rosa. Mr. Zipp has also reviewed Plaintiff's petition. Mr. Zipp has also reviewed Plaintiff's discovery requests and Defendants' responses. Mr. Zipp's curriculum vitae is attached hereto as Exhibit "1."

In addition to the materials described above, Mr. Zipp has viewed the following videos or portions thereof:

	Title	Date	Produced as
1	Connecticut School Massacre Looks Like False Flag Says Witnesses	December 14, 2012	SH VIDEO 1
2	Creepy Illuminati Message in Batman Movie Hints at Sandy Hook School	December 17, 2012	F2mRuEhmoGA
3	Sandy Hook 2nd Shooter Cover-Up	December 19, 2012	6W6b-voc-Ds
4	Sandy Hook Father Remembers Fallen Hero	December 19, 2012	8cZkHDHl6nQ
5	Lower Part of Gotham Renamed "Sandy Hook" in Dark Knight Film	December 21, 2012	Fus1FpQiU-Q
6	Callers React to Foreign Media Pushing Total Gun Confiscation	January 4, 2013	SH VIDEO 2

8	Prof. Claims Sandy Hook Massacre MSM Misinformation	January 10, 2013	D8GxrKJDSL8
9	Sandy Hook AR-15 Hoax? Still No School Surveillance Footage	January 15, 2013	Oo74myC3bqY
10	Clearing Up Some Disinfo on Sandy Hook Massacre with James Tracy	January 18, 2013	SH VIDEO 3
11	Why People Think Sandy Hook is a Hoax	January 27, 2013	tM5ZdO-lgEE
12	Dr. Steve Pieczenik: Sandy Hook was A Total False Flag!	March 27, 2013	5EfyD7Wu5fQ
13	Crisis Actors Used at Sandy Hook! Special Report	April 1, 2013	shQSVhS0hLw
14	Obama Gun Grab Psyop	April 9, 2013	SH VIDEO 4
15	Shadow Govt Strike Again	April 16, 2013	SH VIDEO 5
16	Sandy Hook Police Ordered to Stand Down?	November 23, 2013	xP9fhKUaudio
17	Sandy Hook Investigator Stonewalled and Threatened	February 20, 2014	oGpWtqdiSCY
18	Sandy Hook, False Narratives Vs. The Reality	March 14, 2014	eslvAO2allw
19	Revealed: Sandy Hook Truth Exposed	May 9, 2014	_rSLOYCHNdw
20	Sandy Hook "Officials" Caught In Coverup And Running Scared	May 13, 2014	MH6hml1h-iQ
21	Bombshell: Sandy Hook Massacre Was A DHS Illusion Says School Safety Expert	May 13, 2014	x2a1FwYEZS4
22	Sandy Hook Deaths Missing From FBI Report	September 25, 2014	A2Z0zUZBn7k
23	Sandy Hook Film Censorship Efforts Backfire	December 12, 2014	4T8_WYzH5SM
24	The Ultimate Sandy Hook Debate As The 2nd Anniversary Looms	December 12, 2014	6aK0P-WxjU8

25	Will Bushmaster Lawsuit Reveal Sandy Hook Hoax?	December 16, 2014	BFyDqDLAcLQ
26	Lawsuit Could Reveal Truth About Sandy Hook Massacre	December 27, 2014	kK8Cn1BA928
27	America the False Democracy	December 28, 2014	SH VIDEO 6
28	Why We Accept Govt Lies	January 13, 2015	SH VIDEO 7
29	Title Unknown – Video discussing HONR Network	February 12, 2015	SH VIDEO 8
30	New Bombshell Sandy Hook Information In-Bound	March 4, 2015	_7ib5WkULBY
31	New Sandy Hook Questions Arise from FOIA Hearing	May 29, 2015	5cll79t7Mrw
32	Sandy Hook: The Lies Keep Growing	May 29, 2015	MI3KVj2nVRA
33	School Administrator Exposes Sandy Hook Stonewall	May 29, 2015	SO8Xb-t4nT4
34	Official Claims DHS Involved in Sandy Hook	June 4, 2015	BWsbyH2Wa0E
35	Govt is Manufacturing Crises	July 7, 2015	SH VIDEO 9
36	Retired FBI Agent Investigates Sandy Hook: MEGA MASSIVE COVER UP	July 7, 2015	jCOe3qlgyFA
37	The Fight for Freedom of Information in Sandy Hook	July 8, 2015	l0miXJ-djeA
38	Alex Jones Final Statement on Sandy Hook	November 18, 2016	MwudDfz1yAk
39	Hunt for Wikileaks Source Begins	March 8, 2017	SH VIDEO 10
40	Sandy Hook Vampires Exposed	April 22, 2017	rUn1jKhWTX1
41	Media Refuses To Report Alex Jones' Real Statements On Sandy Hook	June 13, 2017	kf2F7RxJ9e4
42	Zero Hedge Discovers Anomaly In Alex Jones Hit Piece	June 26, 2017	SH VIDEO 11

43	JFK Assassination Documents To DROP Tonight	October 26, 2017	SH VIDEO 12
44	Watch as Megyn Kelly Opens Old Wounds Of Sandy Hook Victims	April 20, 2018	uQkAJykqyeo

Becca Lewis
Stanford University, Department of Communication
Building 120, Room 110
450 Jane Stanford Way
Stanford, CA 94305
(650) 723-1941

Ms. Lewis is an academic researcher in the field of media technologies and online discourse, with a focus on media manipulation and disinformation. Ms. Lewis will offer her expertise on digital political subcultures, internet celebrity, and online news platforms. Ms. Lewis will testify about InfoWars' cultural footprint and role in the online media ecosystem. Ms. Lewis will opine that Defendants' actions were a substantial factor in the spread of false facts about the Sandy Hook shooting. Materials reviewed by Ms. Lewis are being produced as SANDY HOOK-000627-002142. Ms. Lewis has also reviewed the March 4, 2019 deposition of Alex Jones, the November 26, 2019 deposition of Alex Jones, and the November 27, 2019 deposition of Paul Watson. Ms. Lewis has also reviewed the June 26, 2017 video entitled "Zero Hedge Discovers Anomaly In Alex Jones Hit Piece" and the April 22, 2017 video entitled "Sandy Hook Vampires Exposed." Ms. Lewis has also reviewed FSSTX-082669-082812; FSSTX-085731-FSSTX-086492; FSSTX-086569-FSSTX-086583; FSSTX-086588-FSSTX-086589. Ms. Lewis has also reviewed Plaintiff's petition. Ms. Lewis has also reviewed Plaintiff's discovery requests and Defendants' responses. Ms. Lewis' curriculum vitae is attached as Exhibit "2."

Dr. Roy Lubit
165 West End Ave #3k
New York, NY 10023
(917) 846-7829

Dr. Lubit is a forensic psychiatrist with expertise in the impact of stress and emotional trauma. Dr. Lubit will testify about Plaintiff's mental injury and the psychological stresses involved from Defendants' false statements and denial of Plaintiff's trauma. Dr. Lubit will opine that Defendants' actions were a substantial factor in Plaintiff's severe mental anguish and continuing grief. Dr. Lubit will testify about his evaluation of Plaintiff. Dr. Lubit's curriculum vitae is attached as Exhibit "3."

Bernard Pettingill
93 Sandbourne Lane
Palm Beach Gardens, Florida, 33418
561-622-0330

Mr. Pettingill is a forensic economist. Mr. Pettingill will provide opinions about the net worth and financial condition of the Defendants. Mr. Pettingill will review Defendants' net worth interrogatory answers, documents produced in response to net worth discovery, the deposition of Brittany Paz as Free Speech Systems' corporate representative on the topic of net worth, the document produced by Defendants purporting to set forth operating expenditures and profit-loss figures, the documents and notes brought by Ms. Paz to deposition, the purported 2020 balance sheet, 2020 UCC financing statement, and FSSTX-086585 – FSSTX-086615. Mr. Pettingill's CV is attached as Exhibit "4."

II.

Plaintiff reserves the right to supplement this designation with additional designations of experts within the time limits imposed by the Court or any alterations of same by subsequent Court Order or agreement of the parties, or pursuant to the Texas Rules of Civil Procedure and/or the Texas Rules of Civil Evidence.

III.

Plaintiff reserves the right to call undesignated rebuttal expert witnesses whose testimony cannot reasonably be foreseen until the presentation of the evidence against Plaintiff.

IV.

Plaintiff reserves the right to withdraw the designation of any expert and to aver positively that any such previously designated expert will not be called as a witness at trial, and to re-designate same as a consulting expert, who cannot be called by opposing counsel.

V.

Plaintiff reserves the right to elicit any expert opinion or lay opinion testimony at the time of trial which would be truthful, which would be of benefit to the jury to determine material issues of fact, and which would not be violative of any existing Court Order or the Texas Rules of Civil Procedure.

VI.

Plaintiff hereby designates, as adverse parties, potentially adverse parties, and/or as witnesses associated with adverse parties, all parties to this suit and all experts designated by any party to this suit, even if the designating party is not a party to the suit at the time of trial. In the event a present or future party designates an expert but then is dismissed for any reason from the suit or fails to call any designated expert, Plaintiff reserves the right to designate and/or call any such party or any such experts previously designated by any party.

VII.

Plaintiff reserves whatever additional rights they might have with regard to experts, pursuant to the Texas Rules of Civil Procedure, the Texas Rules of Civil Evidence, the case law construing same, and the rulings of the trial court.

Respectfully submitted,

KAster LYNCH FARRAR & BALL, LLP



MARK D. BANKSTON

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WILLIAM R. OGDEN

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ATTORNEYS FOR PLAINTIFF

CERTIFICATE OF SERVICE

I hereby certify that on 30th day of March, 2022, the forgoing document was served upon
all counsel of record via electronic service.

A handwritten signature in black ink, appearing to read 'M. Bankston', is written over a horizontal line.

MARK D. BANKSTON

Served on First Amendment Committee; assisted in the organization of the first
Sunshine Week promoting open, transparent government throughout the United States

Freedom of Information Foundation of Texas 2000-2011

Director and officer

Edited revised edition of the Freedom of Information Handbook

Completed numerous professional development programs in leadership, management and
craft skills through the Poynter Institute, American Press Institute, Cox Enterprises

REBECCA C. LEWIS

Department of Communication - Stanford University
Stanford, CA 94305-2050
beccalewis@protonmail.com

EDUCATION

Stanford University, Department of Communication

PhD Candidate in Communication Theory and Research, September 2018 – present

Advisor: Fred Turner

University of Oxford, Oxford Internet Institute

MSc in the Social Science of the Internet, graduated November 2016

Thesis: “*Candidates of Instagram: Social Media Imagery in the 2016 U.S. Presidential Primaries*”

Columbia University, Columbia College

BA in Film Studies, graduated May 2011

Thesis: “*Going Viral: The Role of YouTube Sensations in a Culture of Memes*”

FELLOWSHIPS AND AFFILIATIONS

Stanford University, Stanford Graduate Fellowship

Gerhard Casper Fellow, September 2018 – present

University of North Carolina at Chapel Hill, Center for Information, Technology, & Public Life

Graduate Affiliate, September 2020 – present

Data & Society Research Institute

Research Affiliate, September 2018 – present

Lightspark Foundation, Impact Guild

Impact Guild Fellow for Social Good, 2020

REFEREED JOURNAL PUBLICATIONS

2021. Lewis, Rebecca and Angèle Christin. “Platform Drama: ‘Cancel Culture,’ Celebrity, and the Struggle for Accountability on YouTube.” Accepted with revisions at *New Media & Society*.

2021. Christin, Angèle and Rebecca Lewis. “The Drama of Metrics: Status and Hierarchies Among YouTube Drama Creators.” *Social Media + Society*.
<https://doi.org/10.1177/2056305121999660>

2021, February 3. Lewis, Rebecca, Alice Marwick, and William Parton. “‘We Dissect Stupidity and Respond to It’: Response Videos and Networked Harassment on YouTube.” *American Behavioral Scientist*. <https://doi-org.stanford.idm.oclc.org/10.1177/0002764221989781>

2019, October 17. Lewis, Rebecca. “‘This is what the news won’t show you’: YouTube creators and the reactionary politics of micro-celebrity.” *Television and New Media*.
<https://doi.org/10.1177/1527476419879919>

WHITE PAPERS AND PUBLIC POLICY REPORTS

2018. Lewis, Rebecca. *Alternative Influence: Broadcasting the Reactionary Right on YouTube*. New York: Data & Society Research Institute. <https://datasociety.net/library/alternative-influence/>
Covered by *The New York Times*, *The Guardian*, *Columbia Journalism Review*, and on NPR *Weekend Edition*
2017. Marwick, Alice and Lewis, Rebecca. *Media Manipulation and Disinformation Online*. New York: Data & Society Research Institute. <https://datasociety.net/library/media-manipulation-and-disinfo-online/>
Covered by *The New York Times*, *The Guardian*, CNN, *The Today Show*, and *Business Insider*

BOOK CHAPTERS

2019. Donovan, Joan, Becca Lewis, and Brian Friedberg. "Parallel Ports: Sociotechnical Change from the Alt-Right to Alt-Tech." In *Post-Digital Cultures of the Far Right: Online Actions and Offline Consequences in Europe and the US* (Maik Fielitz and Nick Thurston, eds.). Verlag, Bielefeld: Transcript Press.
- 2017, December 15. Lewis, Rebecca and Alice Marwick. "Taking the red pill: Ideological motivations for spreading online disinformation." *Understanding and addressing the disinformation ecosystem*. Philadelphia, PA: First Draft News. <https://firstdraftnews.org/wp-content/uploads/2018/03/The-Disinformation-Ecosystem-20180207-v2.pdf>

REFEREED PRESENTATIONS

- 2021, August 5. Lewis, Rebecca and Angèle Christin. "Platform Drama: 'Cancel Culture,' Celebrity, and the Struggle for Accountability on YouTube." *American Sociology Association Media Preconference*, held remotely.
- 2020, May 21. Lewis, Rebecca, Alice Marwick, and William Partin. "We Dissect Stupidity and Respond to It: Response Videos and Networked Harassment." *International Communication Association Annual Meeting*, held remotely.
- 2019, October 3. Lewis, Rebecca and Leon Yin. "Far-Right YouTube and Search Engine Optimization: Manipulations in 'Ranking Cultures.'" *Association of Internet Researchers*, Brisbane, Australia.
- 2019, September 7. Lewis, Rebecca. "Performed Persona Scams: Deceptive Personal Branding and Shifting Concepts of Fraud on Social Media Platforms." *Meeting of the Society for the Social Studies of Science*, New Orleans, LA.
- 2019, August 13. Friedberg, Brian and Rebecca Lewis. "Parallel Ports: Sociotechnical Change from the 'Alt-Right' to Alt-tech." *American Sociology Association*. New York City, NY.
- 2019, May 28. Davison, Patrick, Rebecca Lewis, and Alice Marwick. "You Are the Meme Militia': How Alt-Right Digital Media Perpetuates White Supremacy." *International Communication Association Annual Meeting*, Washington, DC.

2019, March 15. Lewis, Rebecca. "Celebrity, Fandom, and the Source Credibility of Political Influencers." *Eastern Sociological Society Annual Meeting*, Boston, Massachusetts.

2018, August 10. Lewis, Rebecca. "Candidates of Instagram: Political Image-Building and the Co-optation of Micro-Celebrity Online." *American Sociology Association Media Preconference*, Philadelphia, Pennsylvania.

INVITED PRESENTATIONS

2021, August 20. "Researching far-right movements online: an introduction to methods." Presentation at the Institute for Research on Male Supremacism's Summer Institute on Contesting Supremacism, held remotely.

2021, July 17. "Authoritarian cults, media indoctrination, and shared psychosis." Panel presentation at the World Mental Health Coalition Project for National Healing Series, held remotely.

2021, June 23. "Radicalization: From conspiracy theories to violent extremism." Panel discussion at the Atlantic Council's 360/Open Summit, held remotely.
https://www.youtube.com/watch?v=_tThGy3FH-8

2021, June 11. "Racism and Radicalization in the Digital Age: A Robust Response." Keynote speech at the National Council of Urban Education Associates 2021 Virtual Summer Meeting, held remotely.

2021, January 26. "How did we get here? Where do we go next? Information, media & U.S. democracy." Panel discussion at the University of North Carolina Chapel Hill's CITAP Center, held remotely.

2020, December 11. "Hate Not Found: The Politics of De-platforming the Far Right." Panel presentation at public conference in Berlin, Germany, joined remotely.

2020, November 16. "Internet hate speech: What can we do?" Panel presentation at Middlebury College, held remotely.

2019, October 13. "Alternative Influence: Broadcasting the Reactionary Right on YouTube." Presentation at Cultural Formations of the 'Alt-Right' Symposium, University of Michigan, Ann Arbor, MI.

2019, April 17. "The Fake News Cycle: Searching for Truth in the Digital Age." Panel presentation at Washington University, St. Louis, MO.

2018, October 12. "What is the FATE of Platforms? Fairness, Accountability, Transparency and Ethics Under Review." Panel presentation at Concordia University, Montreal, Quebec.

2018, April 13. "Media Manipulation and the Online Far-Right." Annual Faculty Symposium: Techno Cultures in the 21st Century. Borough of Manhattan Community College, New York, NY.

2018, March 8. “Looking past the facts: a sociotechnical approach to fake news, media manipulation, and the far-right alternative press.” Presented with Alice Marwick at University of North Carolina at Chapel Hill.

2017, December 15 – 16. Lewis, Rebecca and Marwick, Alice. “Taking the Red Pill: Ideological Motivations for Spreading Online Disinformation.” Understanding and Addressing the Disinformation Ecosystem, University of Pennsylvania Annenberg School for Communication, Philadelphia, PA.

2017, December 4. “Media Manipulation and Disinformation.” Nouvelles Pratiques du Journalisme 2017. Sciences Po École de Journalisme, Paris, France.

2017, September 25. “Comparative Lessons from Violent Extremism and Far-Right Subcultures.” Perspectives on Why Audiences Are Susceptible to Disinformation. National Endowment for Democracy, Washington, D.C.

RESEARCH & PROFESSIONAL POSITIONS

Data & Society, New York, New York

Affiliated Researcher, September 2018 – present

Full-time Researcher, February 2017 – August 2018

Media Manipulation Project

- Lead Researchers: danah boyd, Founder and President of Data & Society; Alice Marwick, Associate Professor of Communication at UNC Chapel Hill; and Joan Donovan, Research Director of the Shorenstein Center on Media, Politics, and Public Policy
- Project explored the manipulation of public discourse by state and non-state actors on social media platforms, with particular focus on the media manipulation tactics of online far-right extremists in the United States

University of Oxford, Reuters Institute for the Study of Journalism

Research Assistant, October 2015 – January 2016

Online News and Digital Intermediaries Project

- Lead Researchers: Rasmus Kleis Nielsen, Director of Research and Sarah Anne Gantner, Research Fellow
- Project focused on the effects of digital intermediaries (such as Google, Facebook, and Twitter) on traditional news media organizations and government policies

Crimson Hexagon, Boston, MA; October 2011 – August 2015

Crimson Hexagon delivers social media data analytics for corporations and research institutions. It is powered by technology developed by Professor Gary King at the Harvard Institute for Quantitative Social Science.

Director of Social Impact, August 2014 – August 2015

- Founded and led the company’s Social Impact Program, which provided academic, not-for-profit researchers with grants in the form of access to the ForSight social media analytics platform

Client Services Manager, August 2011 – August 2014

- Established social media research methodologies with clients and taught them social media analysis techniques

EDITORIALS AND POPULAR PRESS

2021, August 2. "Space-Cowboys: What Internet history tells us about the inevitable shortcomings of a tech-bro led Space Race." *Tech Policy Press*. <https://techpolicy.press/space-cowboys-what-internet-history-tells-us-about-the-inevitable-shortcomings-of-a-tech-bro-led-space-race/>

2021, January 17. "The Trump ban across social media wasn't censorship – it was a series of editorial decisions by media companies that call themselves social platforms." *Business Insider*. <https://www.businessinsider.com/trump-ban-wasnt-censorship-it-was-an-editorial-decision-2021-1>

2020, December 11. "I warned in 2018 YouTube was fueling far-right extremism. Here's what the platform should be doing." *The Guardian*. <https://www.theguardian.com/technology/2020/dec/11/youtube-islamophobia-christchurch-shooter-hate-speech>

2020, January 7. "All of YouTube, Not Just the Algorithm, is a Far-Right Propaganda Machine." *Medium FFWD*. <https://ffwd.medium.com/all-of-youtube-not-just-the-algorithm-is-a-far-right-propaganda-machine-29b07b12430>

2019, October 9. "It's Easy to Despair and Do Nothing After the Halle Synagogue Shooting. But We Shouldn't." *Medium FFWD*. <https://ffwd.medium.com/its-easy-to-despair-and-do-nothing-after-the-halle-synagogue-shooting-but-we-shouldn-t-34fa86ff48d>

2019, June 9. "YouTube's Bungled PR Announcements Made Carlos Maza's Harassment Worse." *VICE Motherboard*. <https://www.vice.com/en/article/evyqnz/youtubes-bungled-pr-announcements-made-carlos-mazas-harassment-worse-steven-crowder>

2018, November 20. "Why Influence Matters in the Spread of Misinformation." *Data & Society: Points*. <https://points.datasociety.net/why-influence-matters-in-the-spread-of-misinformation-fc99ee69040e>

2018, October 4. "Forget Facebook, YouTube videos are quietly radicalizing large numbers of people – and the company is profiting." *NBC News THINK*. <https://www.nbcnews.com/think/opinion/forget-facebook-youtube-videos-are-radicalizing-millions-young-people-company-ncna916341>

2018, March 22. "Black Panther and the Far-Right." *Data & Society Media Manipulation: Dispatches from the Field*. <https://medium.com/@MediaManipulation/black-panther-and-the-far-right-e83facb735bb>

2017, June 13. "Megyn Kelly Fiasco is one more instance of far-right outmaneuvering media." *Columbia Journalism Review*. https://www.cjr.org/tow_center/megyn-kelly-alex-jones.php

2017, May 18. "The Online Radicalization We're Not Talking About." *New York Magazine: Select All*. <https://nymag.com/intelligencer/2017/05/the-online-radicalization-were-not-talking-about.html>

SELECTED MEDIA APPEARANCES

2021, July 6. "Episode 3: Talking About Garbage." *Does Not Compute Podcast* at University of North Carolina's Center for Information, Technology, and Public Life. <https://citap.unc.edu/does-not-compute/episode-3/>

2021, March 2. "Planet YouTube." *In Land of the Giants: The Google Empire*.
<https://www.vox.com/land-of-the-giants-podcast>

2021, January 21. "How YouTube Normalizes Right-Wing Extremism w/Becca Lewis." *Tech Won't Save Us with Paris Marx*. <https://podcasts.apple.com/us/podcast/how-youtube-normalizes-right-wing-extremism-w-becca-lewis/id1507621076?i=1000506047370>

2020, September 18. "The Alternative Influence Network, with Rebecca Lewis." *I Don't Speak German Podcast*. <https://idontspeakgerman.libsyn.com/65-the-alternative-influence-network-with-rebecca-lewis>

2020, June 4. "Social media unites and divides us. How should we respond?" *NPR Marketplace Tech*.
<https://www.marketplace.org/shows/marketplace-tech/social-media-george-floyd-protests-misinformation-community/>

2019, August. "Infinite Evil: The Incubators of Online Hate." *Stuff NZ: Circuit*.
<https://interactives.stuff.co.nz/2019/circuit/infinite-evil-documentary/>

2019, March 22. "How far-right influencers thrive on YouTube." *Front Burner CBC*.
<https://www.cbc.ca/radio/frontburner/how-far-right-influencers-thrive-on-youtube-1.5066532>

2019, March 19. "More extremists are getting radicalized online. Whose responsibility is that?" *NPR Marketplace Tech*. <https://www.marketplace.org/2019/03/19/extremists-are-being-radicalized-online-whose-responsibility-is-it/>

2019, March 18. "Salvaging ourselves." *Sht!tpost Podcast*.
<https://soundcloud.com/shttpostpodcast/salvaging-ourselves-31819-ft-becca-lewis>

2019, January 9. "Is YouTube radicalizing its users?" *NPR WHYY Radio Times*.
<https://whyy.org/segments/is-youtube-radicalizing-its-users/>

2018, November 27. "Critics Say YouTube Hasn't Done Enough to Crack Down on Extremist Content." *NPR All Things Considered*. <https://www.npr.org/2018/11/27/671285261/critics-say-youtube-hasnt-done-enough-to-crack-down-on-extremist-content>

2018, September 23. "Alternative Influence: Broadcasting the Reactionary Right on YouTube." *NPR Morning Edition*. <https://www.npr.org/2018/09/23/650861652/alternative-influence-broadcasting-the-reactionary-right-on-youtube>

2017, November 10. "Popping the Red Pill: Inside a digital alternate reality." *CNN Business*.
<https://money.cnn.com/2017/11/10/technology/culture/divided-we-code-red-pill/index.html>

SELECTED PRESS COVERAGE

2021, August 3. Tiffany, Kaitlyn. "Left-Wing Activists Are Bringing Back MAGA Twitter." *The Atlantic*. <https://www.theatlantic.com/technology/archive/2021/08/patriottakes-and-future-resistance-twitter/619645/>

2021, July 7. Hayden, Michael Edison. "'We Make Mistakes': Twitter's Embrace of the Extreme Far Right." *Southern Poverty Law Center Hatewatch*.
<https://www.splcenter.org/hatewatch/2021/07/07/we-make-mistakes-twitters-embrace-extreme-far-right>

2021, June 30. Wong, Julia Carrie. "From viral videos to Fox News: how rightwing media fueled the critical race theory panic." *The Guardian*.
<https://www.theguardian.com/education/2021/jun/30/critical-race-theory-rightwing-social-media-viral-video>

2020, August 18. Tiffany, Kaitlin. "How Instagram Aesthetics Repackage Qanon." *The Atlantic*.
<https://www.theatlantic.com/technology/archive/2020/08/how-instagram-aesthetics-repackage-qanon/615364/>

2020, July 11. Herrman, John. "Who Gets the Banhammer Now?" *The New York Times*.
<https://www.nytimes.com/2020/07/11/style/online-communities-social-media-bans-reddit-youtube-twitch-facebook.html?referringSource=articleShare>

2019, July 25. Sankin, Aaron. "YouTube said it was getting serious about hate speech. Why is it still full of extremists?" *Gizmodo*. <https://gizmodo.com/youtube-said-it-was-getting-serious-about-hate-speech-1836596239>

2019, June 8. Roose, Kevin. "The Making of a YouTube Radical." *The New York Times*.
<https://www.nytimes.com/interactive/2019/06/08/technology/youtube-radical.html>

2019, June 5. Roose, Kevin and Kate Conger. "YouTube to Remove Thousands of Videos Pushing Extreme Views." *The New York Times*.
<https://www.nytimes.com/2019/06/05/business/youtube-remove-extremist-videos.html>

2019, January. Turner, Fred. "Machine Politics: The rise of the internet and a new age of authoritarianism." *Harper's Magazine*. <https://harpers.org/archive/2019/01/machine-politics-facebook-political-polarization/>

2018, November 24. Editorial Board. "The New Radicalization of the Internet." *The New York Times*.
<https://www.nytimes.com/2018/11/24/opinion/sunday/facebook-twitter-terrorism-extremism.html>

2018, September 24. Klein, Ezra. "The rise of YouTube's reactionary right." *Vox*.
<https://www.vox.com/policy-and-politics/2018/9/24/17883330/dave-rubin-ben-shapiro-youtube-reactionary-right-peterson>

2018, September 19. Ingram, Matthew. "YouTube's secret life as an engine for right-wing radicalization." *Columbia Journalism Review*. https://www.cjr.org/the_media_today/youtube-conspiracy-radicalization.php

2018, September 18. Solon, Olivia. "YouTube's 'alternative influence network' breeds rightwing radicalization, report finds." *The Guardian*.
<https://www.theguardian.com/media/2018/sep/18/report-youtubes-alternative-influence-network-breeds-rightwing-radicalisation>

TEACHING EXPERIENCE

Teaching Assistant, Stanford University

COMM 1B: Media, Culture, and Society (Professor Fred Turner) – Winter 2020

COMM 154-254: The Politics of Algorithms (Professor Angèle Christin) – Fall 2019

COMM 124-224: Lies, Trust, and Technology (Professor Jeffrey Hancock) – Winter 2019

Published syllabi

2017. Media Manipulation and Disinformation Online Syllabus. Data & Society.

https://datasociety.net/pubs/oh/DataAndSociety_Syllabus-MediaManipulationAndDisinformationOnline.pdf

CURRICULUM VITAE

Roy H. Lubit MD, Ph.D.
165 West End Ave. Suite 3K
New York, NY 10023
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UNDERGRADUATE EDUCATION

JUNE 1975 BA, Cornell University, Ithaca, NY.
Academics: double major in history and chemistry.

MEDICAL EDUCATION

June 1979 MD, New York University School of Medicine, New York, NY.

POSTDOCTORAL TRAINING IN PSYCHIATRY

6/79-6/83 Psychiatry Residency, Yale University School of Medicine, New Haven, CT.
7/83-6/85 Child Psychiatry Residency, The Children's Hospital, Boston, MA.
7/85-6/87 Advanced Psychotherapy Fellowship, Adams House, Boston, MA.
7/01-6/02 Forensic Psychiatry Fellowship, St. Vincent's Hospital, New York, NY.

INTERNATIONAL RELATIONS

1997 Ph.D. in Political Science, GSAS, Harvard University, Cambridge.
Dissertation explored impact of organizational learning on international conflict.

CERTIFICATIONS

Diplomate, American Board of Psychiatry and Neurology, 1984.
Diplomate, American Board of Child and Adolescent Psychiatry, 2003.
Diplomate, American Board of Forensic Psychiatry, 2003.
New York State Medical License 205720-1.
National Board of Medical Examiners, 1980.

FORENSIC QUALIFICATIONS

Special expertise in evaluating emotional trauma, civil rights (section 1983 actions), child custody evaluations, brain injury, psychological/psychiatric malpractice and critiquing forensic evaluations

Board Certifications

- Psychiatry and Neurology
- Child Psychiatry
- Forensic Psychiatry

Declared an Expert in Psychiatry and/or child psychiatry in:

- Bronx Family Court Bronx Supreme Court
- Brooklyn Family Court Brooklyn Supreme Court
- Manhattan Family Court Manhattan Supreme Court
- Queens Family Court Queens Supreme Court
- Richmond County Supreme Court Suffolk County Supreme Court
- Westchester County Court Norfolk County Superior Court in Massachusetts
- Butler County Virginia Court Manhattan Criminal Court
- Federal court, NY Eastern District

Organizational Affiliations:

- Consultant to Children and Law Committee of Association of the Bar of the City of NY

Publications

- Ethics in Psychiatry in Sadock B. and Sadock V. (eds.) Comprehensive Textbook of Psychiatry. 9th edition. Phil: Lippincott, Williams & Wilkins. (in press.)
- Ethics in Psychiatry (with Eth S. and Ladds B.) in Sadock B. and Sadock V. (eds.) Comprehensive Textbook of Psychiatry. 8th edition. Phil: Lippincott, Williams & Wilkins. (2004)
- Forensic Psychiatric/Psychological Assessments (in preparation).
- Forensic Evaluation of Trauma Syndromes by Lubit R, Hartwell N, van Gorp WG, Eth S. in *Child and Adolescent Psychiatric Clinics of North America*. 2002 Oct; 11(4):823-57.
- Juvenile Delinquency, (with Billick) in Rosner (ed.) Principles and Practice of Forensic Psychiatry (2003).
- Child Custody Evaluations in K. Cheng and K. Myers (ed.) *Child and Adolescent Psychiatry: The Essentials*. Lippincott Williams & Wilkins (2005).
- Diagnosis and Treatment of Trauma on Children in K. Cheng and K. Myers (ed.) *Child and Adolescent Psychiatry: The Essentials*. Lippincott Williams & Wilkins (2005).

Presentations

- Lectures on Ethics to Child Psychiatry Fellows at Einstein School of Medicine Winter 2009
- Assessing Forensic Evaluations Rose Seminar, Minneapolis September 11, 2008
- "Family Courts and Child Custody: A System Needing Change: Zigler Center at Yale April 11, 2008
- "Child Abuse Evaluations" Symposium sponsored by Children and Family Law Committee of the Bar Association of the City of NY, January 23, 2008
- "Doing Forensic Evaluations" Joint Conference of the British Arab Psychiatric Association and American Arab Psychiatric Associations in Bahrain April 16, 2006.
- Evaluation of Psychiatric Trauma: International Congress on Law and Psychiatry, 7/7/05, Paris
- Evaluation of Sexual Abuse Allegations: International Congress on Law and Psychiatry, 7/7/05, Paris
- Problems in Child Custody Evaluations Dateline NBC April 15, 2005
- "Evaluating Child Custody Evaluations: Contested Allegations of Domestic Violence, Child Abuse, Superior Parenting Skills" Women's Bar Association of State of New York; June 8, 2004; Brooklyn, NY.
- "Doing Child Custody Evaluations" Bronx 18B Lawyers Retreat; Nov 2003; Mystic, CT.
- "Parental Alienation Syndrome" Bronx 18B Lawyers Retreat; Nov 2003; Mystic, CT.

CLINICAL EXPERIENCE

- 1984-present Private practice (child, adult and forensic psychiatry).
- 2006-2008 Clinical Faculty NYU School of Medicine, Dept of Child Psychiatry and Mt Sinai School of Medicine
- 2003-2004 Assistant Professor of Psychiatry, Mt. Sinai School of Medicine, Dept of Child Psychiatry
- 2002-2003 National Child Traumatic Stress Network, funded by SAMHSA and Assistant Professor of Psychiatry, Saint Vincents Hospital, NY Medical College, Dept of Child Psychiatry
- Consortium for Effective Trauma Treatment, funded by NY Times Foundation
- 2001-2002 Forensic Psychiatry Fellow, Saint Vincents Hospital, New York Medical College
- 2001 ADD and Behavioral Disorders Clinic: Child and Adult Psychiatry.
- 1999-2001 Sabbatical from psychiatry to work as a management consultant for PricewaterhouseCoopers.
- 1998-1999 Psychiatrist, Jewish Board of Family and Children's Services.
- 1997-1998 On-call work for On-Site Psychiatric Services at various hospitals including Metro-West Medical Center and Faulkner Hospital.
- 1996-1997 Vinfen Corporation-Child and adult psychiatry at Fall River State Hospital and Beverly Hospital.
- 1993-1996 Psychiatrist, on-call and locum tenens ward coverage Charles River Hospital, Solomon Carter Fuller and Corrigan Mental Health:.
- Different summers I went wherever there was the greatest need. During the academic year I returned to my research and teaching.
- 1987-1992 Psychiatrist for Scoville and Schwager which placed me at various state hospitals they staffed including Danvers State, Northhampton State, Cape and the Islands, Solomon Carter Fuller. I served as Acting Medical Director at Danver's State and at Cape and the Islands. As noted above, I went wherever there was the greatest need, and during the academic year I returned to research and teaching.

PUBLICATIONS

Book Chapters

Psychotropic medications and crime: The seasoning of the Prozac defense. With Michael Welner and Jada Stewart (in press) In Mozayani, A & Raymon, L. (Eds.) *Handbook of Drug Interactions: A Clinical and Forensic Guide*. Humana Press: New York, NY.

Ethics in Psychiatry in Sadock B. and Sadock V. (eds.) *Comprehensive Textbook of Psychiatry*. 9th edition. Phil: Lippincott, Williams & Wilkins 2009.

Assessing and Treating Traumatized Children in Hosen, Responding to Traumatized Children. Palgrave 2006.

Cognitive Therapy of Children with PTSD, IBID

Child Custody Evaluations in K. Cheng and K. Myers (ed.) *Child and Adolescent Psychiatry: The Essentials*. Lippincott Williams & Wilkins (2005).

Diagnosis and Treatment of Trauma on Children in K. Cheng and K. Myers (ed.) *Child and Adolescent Psychiatry: The Essentials*. Lippincott Williams & Wilkins (2005).

Using Emotional Intelligence To Deal With Difficult People and Organizations in Osland S. et al (eds) *The Organizational Behavior Reader* (7th ed) Saddle River: Prentiss Hall.

Children, Disasters, and the September 11th World Trade Center Attack (with Eth S.) in Norwood A and Ursano B (eds.) *Trauma and Disaster Response and Management*. Wash DC: APA Annual Review of Psychiatry, Volume 22, 2003.

Forensic Evaluation of Trauma Syndromes by Lubit R, Hartwell N, van Gorp WG, Eth S. in *Child and Adolescent Psychiatric Clinics of North America*. 2002 Oct; 11(4):823-57.

Ethics in Psychiatry (with Eth S. and Ladds B.) in Sadock B. and Sadock V. (eds.) *Comprehensive Textbook of Psychiatry*. 8th edition. Phil: Lippincott, Williams & Wilkins. (2004)

Office Politics (with Gordon R) in Kahn J. (ed.) *Mental Health and Productivity in the Workplace*. 2002.

Adolescent Moral Development (with Billick S.) in Rosner R. (ed.) *Textbook of Adolescent Psychiatry* (2003).

Juvenile Delinquency, (with Billick S.) in Rosner S. (ed.) *Principles and Practice of Forensic Psychiatry* (2003).

Child Custody Evaluations in Forensic Psychiatric/Psychological Assessments (in prep.)

Articles

Post Traumatic Stress Disorder in Children in eMedicine World Medical Library, 2010.

Acute Treatment of Disaster Survivors in eMedicine World Medical Library, 2010.

Post Concussive Syndrome. eMedicine World Medical Library, 2010.

Borderline Personality Disorder. eMedicine World Medical Library, 2010.

Sleep Disorders. eMedicine World Medical Library, 2009

Child Abuse and Neglect: Reactive Attachment Disorder. eMedicine World Medical Library, 2009.

Review of Anxiety Disorders in eMedicine's Depression & Anxiety Feature Series, July 2006.

Impact of Trauma on Children (with Rovine D, DeFrancisci Land Eth S.) *Journal of Psychiatric Practice* v9 #2 128-138 (March 2003).

Helping Disaster Survivors. E-Medicine World Medical Library, 2001.

PTSD in Children. E-Medicine World Medical Library, 2001.

Preserving Children's Protection While Enhancing Justice for Parents in Abuse and Neglect Evaluations by Lubit R., Billick S. & Pizarro R. *APPL Journal* V 30 No 2 (July 2002) pp287-290.

The Long Term Organizational Effects of Narcissistic Managers and Executives. *Academy of Management Executive*, Spring 2002.

Tacit Knowledge and Knowledge Management: The Keys to Competitive Advantage. *Organizational Dynamics*, winter 2001.

The Crimean Imbroglio. *East European Review*, August 1995.

The Effects of Drugs on Decision-Making (with Bruce Russett). *Journal of Conflict Resolution*, March 1984.

Books

Forensic Psychiatric/Psychological Assessments with Len Goodstein Ph.D. (in preparation).

Coping with Toxic Managers and Subordinates: Using Emotional Intelligence to Survive and Prosper (2003) Prentiss-Hall.

Developing Emotional Intelligence (in preparation)

Other Publications

"Using Emotional Intelligence to Deal with Difficult Client Personnel (and Colleagues)" Consulting to Management in press June 2004 v15 #2

"The tyranny of toxic managers: An emotional intelligence approach to dealing with difficult personalities" Ivey Business Journal, spring 2004

"Curbing the Tide of Islamic Radicalism in Europe" White Paper requested by CIA I/I/04.

Psychiatrist's Role in Involuntary Hospitalization. Commentary 2. Available at: <http://www.virtualmentor.org> or <http://www.ama-assn.org/ama/pub/category/11103.html>

Book Review (with Billick S.) of *Handbook of Neurodevelopmental and Genetic Disorders in Children*, edited by Sam Goldstein Ph.D. and Cecil Reynolds Ph.D. (New York: The Guildford Press, 1999) for *The Journal of Psychiatry & Law*.

Book Review (with Eth S.) of *Children's Interests/Mother's Rights: The Shaping of America's Child Care Policy*, by Michel S (New Haven: Yale University: 1999) for *Psychiatry*.

Book Review of *The Big Five* by Alexander Saveliev. *MeiMO* (Journal of the Institute for International Economics and International Relations), winter 1996.

Book Review of *Hidden Illness in the White House* by Kenneth Crispell and Carlos Gomez. *Politics and the Life Sciences*, February 1991.

Seven Easy Peaces (with Catherine Perlmutter). *Children Magazine*, Rodale Press, September 1988.

PRESENTATIONS

Assessing Forensic Evaluations, CME talk to Nassau County Bar Association December 15, 2010

Interview on Parental Alienation by Sarah Wallace of ABC Television November 30, 2010

Canadian Broadcasting Company, interviewed on television concerning Chilean Mining Disaster:
August 24, 2010

Canadian Broadcasting Company, interviewed by 8 of their radio stations concerning Chilean Mining
Disaster: August 24, 2010

Quoted in The McChrystal Effect: Mouthing Off To Your Boss Can Get You Fired: on
ABCnews.com June 24, 2010 <http://abcnews.go.com/Business/MindMoodResourceCenter/mouthing-off-boss-fired/story?id=10993015&page=2>

Interviewed by Dow Jones concerning authoritarian managers. April 7, 2010

Lectures on Ethics to Child Psychiatry Fellows at Einstein School of Medicine Winter 2010

Lectures on Psychiatry for Navy Physicians (ADHD, PTSD, Forensic Psychiatry, Ethics in
Psychiatry, Clinical Assessment of Children, Severe Personality Disorders), Columbia, Missouri
October 11 and 12, 2009.

Use of Narratives and Storytelling in Treating PTSD, Trauma Psychiatry & Psychology, International
Center For Psychosocial Trauma, Columbia, Missouri September 30, 2009

Lectures on Ethics to Child Psychiatry Fellows at Einstein School of Medicine Winter 2009

Impact of the Lehman Crisis on People, Fox Business News, September 15, 2008

Assessing Forensic Evaluations Rose Seminar, Minneapolis September 11, 2008

Developing Emotional Intelligence Rose Seminar Minneapolis September 11, 2008

“Assessing and Dealing With Corporate Threats” at ATAP North East Chapter, June 23, 2008.

“Family Courts and Child Custody: A System Needing Change: Zigler Center at Yale April 11, 2008

“Sex Abuse Evaluations” Symposium sponsored by Children and Family Law Committee of the Bar
Association of the City of NY, January 23, 2008

“Experiencing the Trauma of 9/11 and Understanding the Recovery” University of Missouri-
Columbia International Center for Psychosocial Trauma” St Louis June 29, 2006.

“Doing Forensic Evaluations” Joint Conference of the British Arab Psychiatric Association and
American Arab Psychiatric Associations in Bahrain April 16, 2006.

“Evaluation and Treatment of PTSD in Children” Joint Conference of the British Arab Psychiatric
Association and American Arab Psychiatric Associations in Bahrain April 16, 2006.

“Evaluation and Treatment of PTSD in Children” The First Annual Medical Conference of the
International Iraqi Medical Association; Dubai, UAE April 12, 2006.

“Doing Forensic Evaluations” The First Annual Medical Conference of the International Iraqi
Medical Association; Dubai, UAE April 12, 2006.

“Assessing and Treating Emotional Trauma” at International Academy of Law and Mental Health;
Paris July 2005.

- “Assessing Sexual Abuse Allegations” at International Academy of Law and Mental Health; Paris July 2005.
- “New Thoughts on Leadership Development” at Society of Human Resource Management annual national meeting; San Diego June 20, 2005
- “Dealing w. Toxic Managers” at NJ OD Network; Sharing Day; May 9, 2005
- Problems in the Child Custody System on Dateline NBC April 15, 2005
- “Group Dynamics and Decision Disasters” at annual meeting of In2In Thinking Network: Los Angeles, April 9, 2005
- “Assessment of Dangerousness” Hudson River Psychiatric Hospital February 2, 2005
- “Improving the Quality of Evaluations for Sexual Abuse” Queens ACS lawyers; January 10, 2005.
- “Improving the Quality of Child Custody Decisions ” The Second National Battered Mother's Custody Conference; Albany; January 8, 2005.
- "Evaluating Forensic Child Custody Evaluations" to Women's Bar Association of the State of New York; June 8, 2003; Brooklyn, NY.
- “Assessing Dangerousness” Grand Rounds at Hudson River Psychiatric Center 4/7/04.
- “Radical Islam in Europe: Ideological, Psychological and Political Foundations and Potential Responses” invited presentation to Workshop on Radical Islam in Europe sponsored by CIA Office of Russian and European Analysis; McLean, VA Dec 12, 2003.
- “Rethinking the Role of Psychology in Understanding Terrorism” invited presentation to Psychology of Terrorism Workshop sponsored by CIA Counterterrorism Center, Office of Terrorism Analysis; McLean, VA Nov 21, 2003.
- “Assessment and Treatment of Traumatized Children” Grand Rounds MSSM Pediatrics Nov 20, 2003
- “Phenomenology, Psychopathology and Treatment of Emotional Trauma” Grand Rounds Walter Reed Army Hospital, Nov 19, 2003
- “Assessment and Treatment of Traumatized Children” Grand Rounds Pediatrics Elmhurst Hospital Nov 17, 2003
- With John Kastan "Organization of Disaster Mental Health Services in Post 9/11 New York City" Annual Meeting of APHA, San Francisco, November 15-19, 2003
- “Doing Child Custody Evaluations” Bronx 18B Lawyers Retreat; Nov 2003.
- “Parental Alienation Syndrome” Bronx 18B Lawyers Retreat; Nov 2003.
- “Wide Ranging Impact of Emotional Trauma on Children”; William Allanson White Psychoanalytic Institute Sept 25, 2003
- “Violence in the Workplace” UPN 9, 7/25/03.
- “Terrorism” Chair of Panel, International Society of Political Psychology; Boston July 8, 2003.
- “Mind of the Modern Day Terrorist” Paper Panel on Understanding Terrorism at the International Society of Political Psychology; Boston July 8, 2003.

“Limiting the Trauma of Terrorism” Paper Panel on Political Violence and Trauma at the International Society of Political Psychology Boston; July 8, 2003

“Children and Disasters” American Psychiatric Association, San Francisco, May 20, 2003.

“Treatment of Trauma” Grand Rounds, Hudson River Psychiatric Institute, April 23, 2003

“Evaluation and Treatment of Children After Disasters” at Families, Trauma and Forensic Psychiatry Symposium at Walter Reed Army Hospital, April 16, 2003

“Children and Disasters” Maryland APA, April 9, 2003.

“Ethics in Psychiatry” Grand Rounds, Hudson River Psychiatric Institute, February 26, 2003

Chair of panel on “Biological and Chemical Terrorism” at John Jay College’s symposium on Homeland Security After 9/11. January 23, 2003.

“Assessment and Treatment of Traumatized Children”, Children’s National Medical Center, Dec 11, 2002.

“Children's Needs and Obstacles to Meeting Them After Disasters”, LA Child Development Center. November 23, 2002

“School Based Mental Health Screening” International Society of Traumatic Stress Studies November 10, 2002

“Assessment of Traumatized Children and Adolescents” International Society of Traumatic Stress Studies November 7, 2002

“Suicide and Suicide Prevention in Children and Adolescents” Safehorizon. Nov 5, 2002

“Fundamentalism and Terrorism” Group for the Advancement of Psychiatry November 1, 2002

Bereavement and Trauma: Assisting Adolescents After Loss, Covenant House, NYC October 25, 2002

“Living With Uncertainty and Violence: Helping Youth Cope With Trauma” JBFCs Symposium. Oct 7, 2002.

“Treatment of Emotional Trauma” Beth Israel Hospital, 3 half-day sessions in Sept. and Oct. 2002.

“Impact of 9/11” BBC Sept 12, 2002

“Long term impact of 9/11”, NPR Sept 8, 2002

“Recognizing Troubled Children” Private Schools (HALB and HAFTR) September 3, 2002.

“Recognizing Troubled Children” NYC School Nurses, August 27, 2002

“Coping with Stress in the Modern World” NY Life Insurance, August 22, 2002

“Ethics and Leadership” Brookings Institution, Washington DC July 30, 2002.

“Treatment of Children Who Lose Parents” Easthampton Camp. July 10, 2002

“Assessing the Impact Of 9/11 On Children in Schools” Meeting of NYC school psychiatrists and supervising nurses. June 28, 2002

“Impact of WTC Disaster on Firefighters” CBS Evening News May 26, 2002

“Psychological Impact of Trauma” for Montclair NJ School District. May 16, 2002

“Origins of Delinquent Behavior” at Update on Juvenile Delinquency for Society for Adolescent Psychiatry. May 11, 2002

“Impact of Violence On Child Development and Remedial Strategies” at Conference on “Responding to the crisis...Partnering for Violence Prevention” Summit Country Children Services. April 16, 2002

“Terrorism, Trauma and Treatment Options” for the S. Michigan branch of the International Society for the Study of Dissociation Annual Conference Livonia Michigan. April 12, 2002.

Public Radio WNYC: 20 minute interview on psychiatric impact of WTC Disaster, 1/18/02.

“Healing a Traumatized City”, invited speaker at the symposium on “The Trauma of Terror in Children”, Dec 1, 2001 sponsored by the Southern California Society of Child and Adolescent Psychiatry and the Southern California Psychiatric Society.

NY1 Television: 1 hour interview program on psychiatric impact of WTC Disaster, 12/19/01.

Disaster Recovery: Worked with CEOs and HR to help companies recover from Sept 11, 2001 disaster. Also gave presentations to groups of 5 to 170 workers: First American Title, NYC, Sept. 14; Costa Kondylis, NYC, Sept 14; Credit Lyonnais, NYC Sept 21; Financial Models, NYC, Sept 21; Coalition for the Homeless. Oct 3; Sadlier Publishing Oct 4; Queller, Fisher, Dienst Oct 10; Village Voice, Oct 17; May Davis Investment Bank, Nov. 5; NY Life Nov 12; Jacqueline Onassis H.S., Oct 19; PS 89, Nov 6; H.S. of Economics and Finance Nov 14, 2001.

“Juvenile Delinquency” invited speaker, Tri-State Forensic Psychiatry Review Course, 3/2/01.

Chairman of panel on "Political Psychology and War", annual meeting of the International Society of Political Psychology, Washington, DC 6/21/85.

"Altered Metabolic States and Decision-Making", annual meeting of the International Society of Political Psychology, Toronto 6/25/84.

Discussant on papers on the "Effects of Alcohol and Drugs on Leadership Behavior", annual meeting of the International Society of Political Psychology, Toronto 6/27/84.

ORGANIZATIONAL AFFILIATIONS

2004-present Consultant to Association of the Bar of the City of NY Children and Law Committee
2007-present Consultant to Accountability Review Panel of NYC Administration for Children's
Services
2008-present Member of the Forensic Panel (forensic psychiatrists who peer review their cases)
2007-present Giveanhour-offering services to war veterans needing PTSD treatment
2005-2006 Disaster and Trauma Issues Committee of Am Acad of Child and Adolescent Psych
2006-present Dept of Child Psychiatry, NYU School of Medicine
2004-present Dept of Psychiatry, Mt Sinai School of Medicine
2004-2006 American Academy of Child and Adolescent Psychiatry
2004-2005 NY State Interdisciplinary Forum on Mental Health and Family Law
2004-present Consultation Cadre of the School Mental Health Project of UCLA
2003-present Consortium for Research on Emotional Intelligence in Organizations
2002-2004 Senior Consultant on Psychoeducation and Program Development, Center for Social
and Emotional Education (www.csee.net)
2002-2003 Senior Researcher, Center on Terrorism and Public Safety. John Jay College, CUNY
2003-2005 Consultant to International Relations and Terrorism Committees of the Group for the
Advancement of Psychiatry
2002-2004 Manhattan Task Force to End Child Abuse and Domestic Violence
2001-2003 National Child Traumatic Stress Network
2001-2003 New York Times Consortium for Effective Trauma Treatment
1985-1991 Institute of Social and Behavioral Pathology, fellow.
1981-1988 American Psychiatric Association, member.
1983-1987 International Society of Political Psychology, member.
1982- present Yale Edward Zigler Center in Child Development and Social Policy

AWARDS

1990-1991 Harvard-MacArthur Scholar in International Security.

ORGANIZATIONAL DEVELOPMENT EXPERIENCE

- 1999-2001 Consulted to: Mitsubishi, Delta Airlines, PricewaterhouseCoopers, Morgan Stanley, Sadlier Publishing, First American Title, Costa Kondylis, Credit Lyonnais, Financial Models, Coalition for the Homeless.
- 1999-2001 Management consultant in PricewaterhouseCoopers' Strategic and Organizational Change practice.
- 1997-1998 Visiting Scholar at Columbia Business School, New York, NY.
- 1997 Ph.D. in Political Science, GSAS, Harvard University, Cambridge.
Ph.D. dissertation on the role of learning and politics in organizational change.

TEACHING EXPERIENCE

- 2005- Supervisor for residents in child psychiatry, NYU School of Medicine Department of Psychiatry
- 2003-2004 Supervisor for residents in child psychiatry and medical students at Mount Sinai School of Medicine
- 2001-2003 Supervisor for residents in psychiatry at St. Vincent's Hospital.
- 2001 Adjunct Assistant Professor, Zicklin School of Business, New York, NY.
Taught course on Managerial and Leadership Skills in the MBA program.
- 1990-1996 Teaching fellow at Harvard University, for International Conflicts in the Modern World, Ethics and International Relations, Europe After 1945, and The Stalin Era.
- 1998 Teaching assistant at Columbia Business School, for Organizational Behavior and Building the Learning Organization.



BERNARD F. PETTINGILL, JR., PH.D.

Consulting Economist

EDUCATION

Manchester University

Manchester, England

Graduate, January 1977, Ph.D. - Economics

Department of Economics and Social Administration

Dissertation: "Cost-Benefit Analysis of the Treatment of Arthritis – A Comparison of Five Hospitals"

Tulane University

New Orleans, Louisiana

Graduate, June 1973 – MPH – Master Public Health

Department of Health Economics and Medical Care Administration

Loyola University

New Orleans, Louisiana

Graduate, June 1971. MBA – Economics, June 1969

BBA – Business Administration

Contact

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561-624-2854

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ORGANIZATIONS

- Member, American Society of Health Economists, 2008-Present
- Member, City of Palm Beach Gardens Budget Committee, 2007-2012
- Member, AAEFE, 1989-Present
- Member, American Economic Association, 1983-Present
- Member, National Association of Forensic Economists, 1989-Present
- Member, National Association of Business Economists, 1990-Present (Health Roundtable)
- Member, Health Economics Study Group, Great Britain, 1973-Present
- Member, Gideons International, 1978-Present (Past President)
- Member, Rotary International, 1983-2012
- Referee Journal of Forensic Economics (2 years)
- Licensed, State of Florida and State of Louisiana, Health and Life Insurance. No. 43972-6317 (FL)
- Associate Member, National Structured Settlements Trade Association

Bernard F. Pettingill, Jr., Ph.D.
Consulting Economists
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EXPERIENCE

1985 to Present

FORENSIC ECONOMIST/MEDICAL & PROFESSIONAL PRACTICE

Financial Analysis, Structured Settlement Negotiations

1988 to 1998

FLORIDA INSTITUTE OF TECHNOLOGY

*Graduate Business School
Treasure Coast Graduate Center
Stuart, Florida.*

Professor of Economics - Taught Advanced Macroeconomics, Managerial Economics, Health Care Economics, Advanced Microeconomics (Retired)

1987 to 1988

PALM BEACH ATLANTIC COLLEGE

*Rinker School of Business
West Palm Beach, Florida*

Professor of Economics - Taught Microeconomics, Macroeconomics, Free Enterprise System and International Economics

1980 to 1987

UNIVERSITY OF SOUTHWESTERN LOUISIANA

*Lafayette, Louisiana.
College of Business Administration*

Associate Professor - Taught undergraduate and graduate courses in Economics, Finance and Management

1978 to 1980

LSU MEDICAL CENTER

*New Orleans, Louisiana
Department of Medicine*

Associate Professor and Administrative Assistant - Principal duties at Medical School included lectures in Medical Economics, grant writing, and computer-assisted data analysis for drug research

1977 to 1978

UNIVERSITY OF NEW ORLEANS

*New Orleans, Louisiana
Department of Economics and Management*

Assistant Professor - Taught undergraduate courses in Economics and Health Care

1975 to 1977

UNIVERSITY OF MANCHESTER

*Manchester, England
Department of Economics and Social Administration*

Research Associate - Dual appointment: Lecturer in Economics and Course Coordinator of the Administrative Development Course for Hospital Administrators

1974 to 1975

CENTRE FOR STUDIES IN ECONOMICS AND SOCIAL POLICY

London, England

Research Fellow - Primary task was a case study of Wigan Community Health Council. Research published in a sequel to the book, Politics of Consumer Representation, by R. Klein and J. Lewis, Centre for Studies in Social Policy, London, England.

Bernard F. Pettingill, Jr., Ph.D.
Consulting Economists
Page 3

PUBLICATIONS

Pettingill, B. "Wigan Community Health Council." in Community Health Councils: Four Case Studies; ed. Janet Lewis (Centre for Studies in Social Policy, Publ.) 1976 pp. 87-98.

Pettingill, B. "Cost Effectiveness of Chiropractic Treatment in Louisiana – A Feasibility Study." Louisiana Journal of Chiropractics, September-October 1977 pp. 9-10.

Pettingill, B. "Review of a History of Economic Thought." by William J. Barber. Review of Business and Economic Research XIII, Fall 1977 pp. 111-112.

Pettingill, B. "A Feasibility Study of the Cost-Effectiveness Analysis of Rheumatoid Arthritis in Great Britain." Ph.D., Thesis, Manchester Business School Publication, January 1977, p. 275.

Pettingill, B.F. "Cost-Effectiveness Analysis in the Hospital." Dimensions in Health Services Canada, January 1978, pp. 19-20.

Pettingill, B. and Langdon, C. "View on Youth Employment: A Survey of Businessmen and Vocational Counselors in the Greater New Orleans Area." Business Review Louisiana Tech Publishers, March 1979, pp. 23-28.

Pettingill, B. "Physicians' Estimates of Disability vs Patients' Reports of Pain." Psychosomatics, December 1979, Vol. 20, No. 12, pp. 827-830.

Pettingill, B. and Langdon, C. "The Problem of Teenage Workers as Viewed by the New Orleans Businessmen." Louisiana Business Survey, Fall 1979. pp.6-8.

Langdon, C., Pettingill, B.F., Bhatia, S. "Vocational-Technical Education in Region I of Louisiana." Research Study 44, Division of Business and Economic Research, University of New Orleans, May 1982. p. 124.

Payne, Stephen L and Pettingill, B.F. "How Much Theft Can You Tolerate?" Security Management, August 1982. pp. 100-102.

Langdon, Charles, Pettingill, B.F., and Bhatia, S. "Vo-Tech in Metro New Orleans: The Student and the Schools." Louisiana Business Survey, Summer 1982. pp. 9-11.

Pettingill, B.F., Bhatia, S., and Langdon, C. "The Counselor-Firstline Manager in the Vocational Technical Educational System." Vocational Guidance Quarterly, December 1985. pp. 14-17.

Payne, S. and Pettingill, B.F. "Theft Perceptions." The Personnel Administrator. October 1983. pp. 102-111.

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Consulting Economists
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Bernard F. Pettingill, Jr., Ph.D.
Consulting Economists
Page 6

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MOVIES AND EDITORIALS

Executive Producer –

"City of A Million Dreams" 89 minute on History of New Orleans and Jazz Through Funerals. See [www.NYTimes.com/video/opinion/1000000007768852](https://www.nytimes.com/video/opinion/1000000007768852) - YouTube.

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Automated Certificate of eService

This automated certificate of service was created by the eFiling system. The filer served this document via email generated by the eFiling system on the date and to the persons listed below. The rules governing certificates of service have not changed. Filers must still provide a certificate of service that complies with all applicable rules.

Andrew Grant on behalf of Mark Bankston
Bar No. 24071066
aj@fbtrial.com
Envelope ID: 63104388
Status as of 4/1/2022 3:25 PM CST

Associated Case Party: NEIL HESLIN

Name	BarNumber	Email	TimestampSubmitted	Status
Avishay Moshenberg		avi.moshenberg@mhllp.com	3/30/2022 2:07:04 PM	SENT
Mark D.Bankston		mark@fbtrial.com	3/30/2022 2:07:04 PM	SENT
William R.Ogden		bill@fbtrial.com	3/30/2022 2:07:04 PM	SENT

Associated Case Party: ALEXEJONES

Name	BarNumber	Email	TimestampSubmitted	Status
Jacquelyn W.Blott		jblott@jblottlaw.com	3/30/2022 2:07:04 PM	SENT
Federico Reynal	24060482	areynal@frlaw.us	3/30/2022 2:07:04 PM	SENT

Associated Case Party: INFOWARS LLC

Name	BarNumber	Email	TimestampSubmitted	Status
Jacquelyn W.Blott		jblott@jblottlaw.com	3/30/2022 2:07:04 PM	SENT

Associated Case Party: OWEN SHROYER

Name	BarNumber	Email	TimestampSubmitted	Status
Jacquelyn W.Blott		jblott@jblottlaw.com	3/30/2022 2:07:04 PM	SENT

Case Contacts

Name
Warren Lloyd Vavra
Velva Lasha Price

Automated Certificate of eService

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Andrew Grant on behalf of Mark Bankston
Bar No. 24071066
aj@fbtrial.com
Envelope ID: 63104388
Status as of 4/1/2022 3:25 PM CST

Case Contacts

William Ogden		bill@fbtrial.com	3/30/2022 2:07:04 PM	SENT
Andrew Grant		aj@fbtrial.com	3/30/2022 2:07:04 PM	SENT
Jacquelyn W.Blott		jblott@jblottlaw.com	3/30/2022 2:07:04 PM	SENT

Associated Case Party: FREE SPEECH SYSTEMS LLC

Name	BarNumber	Email	TimestampSubmitted	Status
Jacquelyn W.Blott		jblott@jblottlaw.com	3/30/2022 2:07:04 PM	SENT

AR APR 01 2022
At 3:00 P.M.
Velva L. Price, District Clerk

D-1-GN-18-001835

NEIL HESLIN and
SCARLETT LEWIS

VS.

ALEX E. JONES, INFOWARS, LLC,
FREE SPEECH SYSTEMS, LLC, and
OWEN SHROYER

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IN DISTRICT COURT OF
TRAVIS COUNTY, TEXAS
261st DISTRICT COURT

D-1-GN-18-001842

LEONARD POZNER AND
VERONIQUE DE LA ROSA

VS.

ALEX E. JONES, INFOWARS, LLC,
and FREE SPEECH SYSTEMS, LLC

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IN DISTRICT COURT OF
TRAVIS COUNTY, TEXAS
345th DISTRICT COURT

**ORDER ON PLAINTIFFS' MOTION FOR SANCTIONS
REGARDING CORPORATE DEPOSITION**

On this day, the Court considered Plaintiffs' Motion for Sanctions Regarding Corporate Deposition. For the reasons below, the Court finds that the Motion should be granted.

BACKGROUND

Defendants' pattern egregious discovery abuse is well-detailed in the many prior orders of this Court,¹ but a brief history of Plaintiffs' attempts to take a corporate deposition is as follows:

¹ In addition to discovery abuse in these cases, the Court has considered Defendants' consistent pattern of bad faith litigation tactics and discovery abuse in other cases and courts. First, as described

On August 31, 2018, the Court ordered Defendants to appear for depositions in Mr. Heslin's defamation claim (D-1-GN-18-001835). Defendants refused to appear for the depositions or respond to written discovery. After Plaintiff filed a Motion for Sanctions, Defendants initiated an appeal.

On January 25, 2019, this Court ordered Defendants to respond to court-approved discovery requests and appear for depositions in Ms. Lewis' IIED case (D-1-GN-18-006623). Defendants presented Rob Dew as a corporate designee, who was unable to give any testimony. The Court chastised "the failure of the defendants to present an InfoWars corporate representative who has a clue about InfoWars as a corporation," noting that "it was a pretty meaningless deposition." Defendants agreed to stipulate to Plaintiff's petition for the purposes of the TCPA motion and voluntarily pay \$8,100 in attorney's fees to avoid sanctions at that time.

Following the events in *Lewis*, the premature appeal in Mr. Heslin's defamation case was dismissed for lack of jurisdiction. Upon remand to this Court in the fall of 2019, InfoWars again refused to respond or appear for deposition. On October 18, 2019, this Court assessed

in this Court's prior orders, InfoWars has also committed discovery abuse in *Fontaine v. InfoWars, LLC, et al.* (D-1-GN-18-1605). In that case, InfoWars failed to timely answer written discovery. After InfoWars provided untimely and evasive responses, Mr. Fontaine was forced to bring a motion to compel InfoWars' compliance, for which this Court awarded sanctions and attorney's fees on September 15, 2021. The Court also notes that Defendants have repeatedly violated discovery orders in *Lafferty v. Jones*, a similar lawsuit brought after the instant cases by a different set of Sandy Hook parents in the Superior Court of Connecticut, ultimately resulting in a default judgment on liability several weeks after this Court's entry of default judgment. The Court further notes that Defendants have been sanctioned by the Texas Court of Appeals for bringing a frivolous appeal in Mr. Heslin's case. Finally, as noted in the Court's default judgment order, Mr. Jones has publicly declared that he considers these lawsuits to be a "show trial," showing clear signs that Defendants' discovery violations are the result of bad faith. Mr. Jones' recent deposition confirmed these signs, during which Mr. Jones testified about his indifference to his discovery obligations.

sanctions of \$25,875, while also ruling that Plaintiff's burdens were taken as established for the purposes of the TCPA motion.

On October 18, 2019, this Court ordered Defendants to appear for deposition in Mr. Heslin's IIED case (D-1-GN-18-004651).² Again, Rob Dew was produced as the corporate designee. Again, Mr. Dew had not been prepared and was unable to offer any meaningful testimony. On December 20, 2019, the Court assessed sanctions totaling \$100,000 and held the Defendants in contempt for intentionally disobeying the order. At that time, the Court held a default judgment under advisement based on representations by Defendants that discovery would be promptly supplemented during the appellate stay.

All the cases were remanded in June 2021. Defendants had not taken any steps to address the discovery situation during the appeal, and for the next three months following remand, Defendants ignored Plaintiffs' demands for compliance. On September 27, 2021, this Court issued a default judgment on liability and awarded attorney's fees of \$45,925.

THE DECEMBER 3, 2021 CORPORATE DEPOSITION

Following the default judgment, Plaintiffs again sought the Defendants' depositions to secure testimony relevant to the trial on compensatory and punitive damages. Defendants produced Daria Karpova for the deposition. The transcript of Ms. Karpova's deposition shows that she was not prepared to discuss any of the eight topics for which she had been designated. Her testimony as a whole demonstrated profound disrespect for the discovery process. Ms. Karpova's lack of preparation was flagrant and egregious, especially given the repeated refusal to prepare a designee.

² Subsequently consolidated with D-1-GN-18-001835.

On January 14, 2022, the Court heard argument on Plaintiffs' Motion for Sanctions concerning Ms. Karpova's deposition. The Court granted the Motion, awarded costs, and ordered the Defendants to appear one more time. The Court provided detailed instructions for preparing the designee(s).

THE FEBRUARY 2022 CORPORATE DEPOSITION

On February 14-15, 2022, Defendants presented Brittany Paz as the designee in both the Sandy Hook and Fontaine cases. A review of the deposition transcript shows that Defendants flagrantly disobeyed the Court's order in preparing Ms. Paz. As a result, she was unable to give adequate testimony on any of the topics. Plaintiffs have now faced five non-appearances at corporate depositions on the issues at the heart of their claims despite every remedial action taken the Court, including the severe sanction of default and over \$200,000 in cumulative attorney's fees.

FINDINGS

The Court finds that Defendants have intentionally thwarted the legitimate discovery process in these cases. The egregiousness and repetitiveness of Defendants' obstruction exhibits a disregard for and disrespect of the integrity of this Court and our judicial system. Plaintiffs' discovery of facts necessary to properly present their claim for damages has been irreparably prejudiced in virtually all respects. Absent severe action from this Court, Defendants will ultimately profit from their sabotage of the discovery process.

The Court therefore ORDERS that:

1. Pursuant to Rule 215(b)(1), the Court disallows any further discovery by Defendants. Any obligation of the Plaintiffs to respond to any pending discovery is terminated.

2. Pursuant to Rule 215(b)(2), the Court orders that Defendants shall pay all of the expenses of discovery and taxable court costs in these lawsuits. Plaintiffs shall submit evidence setting forth any court costs, expenses, or attorney's fees relating to discovery or discovery motions, excepting those amounts which were already awarded in any prior order of the Court. Defendants may object to the amount within seven days after Plaintiff's filing.

3. Pursuant to Rule 215(b)(3), the Court orders that designated facts shall be taken to be established for the purposes of the action. Specifically, the jury will be instructed that any factual dispute relating to the following topics shall be taken as established in favor of the Plaintiffs:

- Sourcing and research for the videos described in Plaintiffs' petitions.
- Individuals involved in the production of the videos described in Plaintiffs' petitions.
- Internal editorial discussions regarding InfoWars' coverage of the Sandy Hook Elementary School shooting.
- The company's knowledge of the Plaintiffs.
- The audience reach of the videos described in Plaintiffs' petitions.
- The documents produced by the company in response to Plaintiffs' discovery requests.
- Efforts made by the company to preserve potential evidence.
- The company's business structure and relationship with other parties.

Dated April 1, 2021.


Hon. Maya Guerra Gamble

Filed in The District Court
of Travis County, Texas
AR OCT 05 2021
At 3:00 P.M.
Velva L. Price, District Clerk

D-1-GN-18-001835

NEIL HESLIN
Plaintiff

VS.

ALEX E. JONES, INFOWARS, LLC,
FREE SPEECH SYSTEMS, LLC, and
OWEN SHROYER,
Defendants

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IN DISTRICT COURT OF

TRAVIS COUNTY, TEXAS

459th DISTRICT COURT

D-1-GN-18-001842

LEONARD POZNER AND
VERONIQUE DE LA ROSA
Plaintiffs

VS.

ALEX E. JONES, INFOWARS, LLC,
AND FREE SPEECH SYSTEMS, LLC,
Defendants

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IN DISTRICT COURT OF

TRAVIS COUNTY, TEXAS

459th DISTRICT COURT

D-1-GN-18-006623

SCARLETT LEWIS
Plaintiff

VS.

ALEX E. JONES, INFOWARS, LLC,
AND FREE SPEECH SYSTEMS, LLC,
Defendants

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IN DISTRICT COURT OF

TRAVIS COUNTY, TEXAS

459th DISTRICT COURT

**ORDER ON ATTORNEY'S FEES FOR
PLAINTIFFS' MOTIONS FOR SANCTIONS**

On this day, the Court considered Plaintiffs' requests for attorney's fees in connection with four sanctions motions in the above styled cases. In a declaration from their counsel on September 1, 2021, Plaintiffs requested attorney's fees under Rule 215 for the following motions:

Heslin v. Jones (D-1-GN-19-004651)¹
Supplemental Brief on Motion for Default Judgment, filed June 28, 2021
\$21,381.25

Heslin v. Jones (D-1-GN-18-001835)
Second Motion for Contempt Under Rule 215, filed July 6, 2021
\$10,656.25

Lewis v. Jones (D-1-GN-18-006623)
Lewis Motion for Contempt Under Rule 215, filed July 6, 2021
\$6,531.25

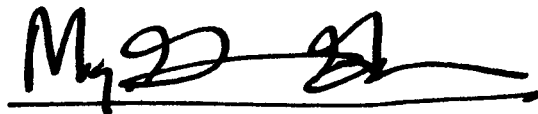
Pozner v. Jones (D-1-GN-18-001842)
Motion to Compel and Motion for Sanctions, filed July 27, 2021
\$7,356.25

On September 8, 2021, Defendants filed their Objections and Responses to Plaintiffs' Declaration Regarding Attorney's Fees. The Court has considered the objections and the exhibit attached thereto. The Court OVERRULES those objections and finds that the \$45,925 in fees claimed by the Plaintiffs are reasonable.

Because the Court has found each of the Plaintiffs' Motions to be meritorious, the Court ORDERS that within 30 days of the entry of this Order, the Defendants shall pay:

1. \$32,037.50 to Plaintiff Neil Heslin;
2. \$6,531.25 to Plaintiff Scarlett Lewis;
3. \$7,356.25 to Plaintiffs Veronique De La Rosa and Leonard Pozner.

Signed October 4, 2021



¹ During the pendency of the motion, this cause was consolidated with *Heslin v. Jones*, D-1-GN-18-001835.

AR OCT 27 2021
At 4:30 P.M.
Velva L. Price, District Clerk

D-1-GN-18-001835

NEIL HESLIN	§	IN DISTRICT COURT OF
<i>Plaintiff</i>	§	
	§	
VS.	§	
	§	TRAVIS COUNTY, TEXAS
ALEX E. JONES, INFOWARS, LLC,	§	
FREE SPEECH SYSTEMS, LLC, and	§	
OWEN SHROYER	§	
<i>Defendants</i>	§	261 st DISTRICT COURT

**AMENDED ORDER ON PLAINTIFF'S MOTION FOR DEFAULT
JUDGMENT AND 2nd MOTION FOR CONTEMPT**

On this day, the Court considered Plaintiff's Motion for Default Judgment and Plaintiff's 2nd Motion for Contempt. The Court finds that both Motions should be granted.

BACKGROUND

I. Discovery Order in Mr. Heslin's Defamation Claim

On August 31, 2018, this Court ordered Defendants to respond to court-approved discovery requests and appear for depositions. Defendants refused to respond. After Plaintiff filed a Motion for Contempt, Defendants initiated an appeal. The premature appeal was dismissed for lack of jurisdiction. Upon remand to this Court in the fall of 2019, InfoWars again refused to respond. On October 18, 2019, this Court granted Plaintiff's Motion for Contempt and assessed sanctions while also making certain findings which affected Defendants' TCPA motion.

Defendants then appealed the Court's ruling on the TCPA motion, but they did not appeal the contempt order or the discovery order. Following remand on June 4, 2021, Defendants took no action to comply with the August 31, 2018 discovery order, or any of the Court's other discovery orders, for over a month. Plaintiff then filed his 2nd Motion for Contempt under Rule 215 on July 6, 2021. Even after that motion was filed, Defendants continued to withhold discovery through July and August.

On August 26, 2021, a few days before the hearing on this matter, Defendants provided some additional documents to Mr. Heslin, but it is clear these documents do not satisfy Defendants' outstanding obligations to the August 31, 2018 discovery order. In addition, Defendants never served responses to the court-ordered discovery requests. Nor did Defendants ever make efforts for a deposition of Mr. Jones, Mr. Shroyer, or the two corporate defendants as required by the discovery order.

II. Discovery Order in Mr. Heslin's IIED Claim

On October 18, 2019, this Court ordered expedited discovery in Mr. Heslin's IIED claim, including written discovery and depositions. Defendants failed to comply with the order in numerous respects. On December 20, 2019, the Court assessed sanctions and held the Defendants in contempt for intentionally disobeying the order. At that time, the Court took under advisement all additional remedies based on representations by Defendants that discovery would be promptly supplemented during the appellate stay. As the Court stated in its prior order, the amount of supplemental discovery would be a factor when revisiting sanctions upon remand.

Despite their promises, Defendants failed to supplement any discovery following the 2019 hearing and prior to remand. Defendants also failed to supplement any discovery for nearly three months following remand in June 2021.

On August 26, 2021, a few days before the hearing on this matter, Defendants provided some additional documents to Mr. Heslin, but it is clear these documents do not satisfy Defendants' outstanding obligations to the October 18, 2019 discovery order. In addition, Defendants did not provide any supplemental discovery responses, nor did Defendants make efforts for a corporate representative deposition to cure their non-appearance. Nor have the Defendants fully and fairly responded to the discovery requests at issue.

FINDINGS

The Court now finds that a default judgment on liability should be granted. The Court finds that Defendants' discovery conduct in this case has shown flagrant bad faith and callous disregard for the responsibilities of discovery under the rules. The Court finds Defendants' conduct is greatly aggravated by the consistent pattern of discovery abuse throughout the other Sandy Hook cases pending before this Court. Prior to the discovery abuse in this case, Defendants also violated this Court's discovery orders in *Lewis v. Jones, et al.* (D-1-GN-18-006623). After next violating the discovery orders in this case, Defendants also failed to timely answer discovery in *Pozner v. Jones, et al.* (D-1-GN-18-001842), another Sandy Hook lawsuit, as well as *Fontaine v. InfoWars, LLC, et al.* (D-1-GN-18-1605), a similar lawsuit involving

Defendants' publications about the Stoneman Douglas High School shooting. The Court also notes that Defendants have repeatedly violated discovery orders in *Lafferty v. Jones*, a similar defamation lawsuit brought by a different set of Sandy Hook parents in the Superior Court of Connecticut. In sum, Defendants have been engaged in pervasive and persistent obstruction of the discovery process in general. The Court is also faced with Defendants' refusal to produce critical evidence. Defendants have shown a deliberate, contumacious, and unwarranted disregard for this Court's authority. Based on the record before it, this Court finds that Defendants' egregious discovery abuse justifies a presumption that its defenses lack merit.

In reaching its decision, this Court has considered lesser remedies before imposing sanctions that preclude Defendants' ability to present the merits of their liability defense. However, the Court has more than a sufficient record to conclude that an escalating series of judicial admonishments, monetary penalties, and non-dispositive sanctions have all been ineffective at deterring the abuse. This Court rejects lesser sanctions because they have proven ineffective when previously ordered. They would also benefit Defendants and increase the costs to Plaintiffs, and they would not adequately serve to correct the Defendants' persistent discovery abuses. Furthermore, in considering whether lesser remedies would be effective, this Court has also considered Defendants' general bad faith approach to litigation, Mr. Jones' public threats, and Mr. Jones' professed belief that these proceedings are "show trials."

It is clear to the Court that discovery misconduct is properly attributable to the client and not the attorney, especially since Defendants have been represented by seven attorneys over the course of the suit. Regardless of the attorney, Defendants' discovery abuse remained consistent.

It is accordingly ORDERED that a default judgment be entered against Defendants with respect to liability in this lawsuit.

It is further ORDERED that Defendants shall pay reasonable attorney's fees incurred in connection with Plaintiffs' 2nd Motion to Compel and Plaintiff's Supplemental Brief in Support of Default Judgment.

Dated October 24, 2021.


Hon. Maya Guerra Gamble

AR NOV 05 2021
At 3:00 P.M.
Velva L. Price, District Clerk

D-1-GN-18-001835

NEIL HESLIN
Plaintiff

VS.

ALEX E. JONES, INFOWARS, LLC,
FREE SPEECH SYSTEMS, LLC, and
OWEN SHROYER,
Defendants

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IN DISTRICT COURT OF

TRAVIS COUNTY, TEXAS

261st DISTRICT COURT

D-1-GN-18-001842

LEONARD POZNER AND
VERONIQUE DE LA ROSA
Plaintiffs

VS.

ALEX E. JONES, INFOWARS, LLC,
AND FREE SPEECH SYSTEMS, LLC,
Defendants

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IN DISTRICT COURT OF

TRAVIS COUNTY, TEXAS

345th DISTRICT COURT

D-1-GN-18-006623

SCARLETT LEWIS
Plaintiff

VS.

ALEX E. JONES, INFOWARS, LLC,
AND FREE SPEECH SYSTEMS, LLC,
Defendants

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IN DISTRICT COURT OF

TRAVIS COUNTY, TEXAS

98th DISTRICT COURT

**ORDER ON PLAINTIFFS' MOTION FOR LEAVE
TO SERVE NET WORTH DISCOVERY**

On this day, the Court considered Plaintiffs' Motion for Leave to Serve Net Worth Discovery. The Court finds there is good cause to grant the Motion because Plaintiffs have a substantial likelihood of success on the merits of each of their claims for exemplary damages.

It is hereby ORDERED that Alex Jones, Owen Shroyer, Free Speech Systems, LLC, and InfoWars, LLC are all ordered to answer the following discovery requests within 30 days:

Interrogatory No. 1: Provide a statement of your net worth. The term "net worth" means the amount by which total assets (including income) exceed total liabilities. Assets shall include items such as cash on hand, cash in accounts, checking, savings, brokerage, securities, cryptocurrency, tradeable commodities, precious metals, vehicles, business equipment, real estate, personal items, and negotiable instruments. Liabilities shall include such items as loans, notes, accounts payable, credit card balances, and mortgages. The statement of net worth should include:

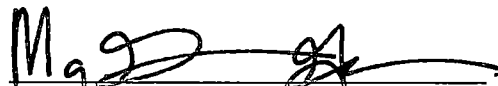
- a. All income and assets of whatsoever kind and nature and wherever situated.
- b. A list of all assets transferred in any manner since April 16, 2018. Transfers in the routine course of business which resulted in an exchange of assets or services of substantially equivalent value need not be specifically disclosed.

Request for Production No. 1: Produce any balance sheets or financial statements reflecting your net worth.

Request for Production No. 2: Produce any account statements for 2021 for any bank accounts or brokerage accounts you own.

Furthermore, it is hereby ORDERED that Plaintiffs are permitted to inquire about Defendants' responses at any future depositions.

Dated November 4, 2021.


Hon. Maya Guerra Gamble